

Comments on PR's F/R section.

1. 865.A can be deleted.
2. 865.F: as written, there is no incident (i.e., per occurrence) amount required. Therefore, this part should read:
The required annual aggregate amounts ~~amounts of financial liability coverage required for incident and for each total by year~~, do not limit, in any way, the personal liability of the owner and operator.
3. 866.B: missing "it" complies
4. 867.B and C are completely inaccurately written. See separate attached Word file for rewording.
5. 867.E: "cover" needs to be "coverage"
6. 867.F: "cover" needs to be "coverage"
7. 869.A: easiest fix – change “,” to “;” unless want to re-word sentence
8. 869.C: term should be “licensed” not “authorized”. I defer to legal counsel on this one, but I think insurance companies are actually licensed by insurance commissioners.
9. 870.A: Need to reference specifically to Circular 570 of the Treasury. (see 280.98(a))
10. 871.A: “ja” should be “the”
11. 872.A: remove extra periods
12. 873.A: standby trust only applies to guarantee, surety bond, and letter of credit. The way it’s worded now implies all mechanisms need to have a standby trust.
13. 873.B: “alternate” needs to be “stand by”
14. 873.C: “alternate” needs to be “stand by”
15. 873.D: This entire section does not read properly (i.e., does not make grammatical sense). Please compare with 280.103(c)
16. 875.B: This is missing the requirement that o/o needs to notify the Board if the o/o fails to obtain alternate coverage. See last part of 280.109(b)
17. 876.A needs to be re-ordered. See wording of 280.110
18. 876: Missing a comparable 280.110(b) requirement (i.e., An owner or operator must certify compliance with the financial responsibility requirements of this part as specified in the new tank notification form when notifying the appropriate state or local agency of the installation of a new underground storage tank under §280.22.)
 - Does Puerto Rico have a new tank notification form requirement?
19. 876.B: “as described in this Part” seems superfluous
20. 877.B.5.: not sure this is needed. This was in the federal regs in reference to state funds, which Puerto Rico does not have.
21. 877.B.6: I don’t understand how the owners know what this certification looks like if there are no wordings.
22. 878.A: Currently this is to “certify” the funds??? Which makes no sense. Needs to be worded to say “place the amount of funds into the stand by trust fund if:” See 280.112(a).
23. 878.A: Missing a comparable 280.112(a)(1)(i) as one of the conditions under 878.A.
24. 878.B: insert “stand by” in front of “trust”
25. 878.B1: Does not read properly (i.e., does not make grammatical sense). Please compare with 280.112(b)(1)

26. 879: Does not read properly (i.e., does not make grammatical sense). Please compare with 280.113.
27. 880.A: Does not read properly (i.e., does not make grammatical sense). Please compare with 280.114(a).
28. 880.B: Does not read properly (i.e., does not make grammatical sense). Please compare with 280.114(b).